



PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), plaintiff Shiva Stein ("Plaintiff") hereby voluntarily dismisses the above-captioned action (the "Action") with prejudice. Defendants have filed neither an answer nor a motion for summary judgment. Plaintiff's dismissal of the Action is therefore effective upon the filing of this notice. Plaintiff requests that this Court retain continuing jurisdiction for purposes of entertaining a mootness fee application, if any, which will be filed under this case number.

DATED: August 12, 2019

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**

By: /s/ Rachele R. Byrd  
RACHELE R. BYRD  
Rachele R. Byrd  
Marisa C. Livesay  
Brittany N. DeJong  
750 B Street, Suite 1820  
San Diego, CA 92101  
Telephone: (619) 239-4599  
Facsimile: (619) 234-4599  
byrd@whafh.com  
livesay@whafh.com  
dejong@whafh.com

**Of Counsel:**

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**

Gloria Kui Melwani  
270 Madison Avenue  
New York, NY 10016  
Telephone: (212) 545-4600  
Facsimile: (212) 686-0114  
melwani@whafh.com

*Counsel for Plaintiff*

805729